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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

JUN 19 4 42 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

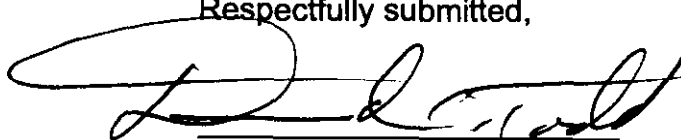
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

SECOND SET OF INTERROGATORIES OF
MAIL ORDER ASSOCIATION OF AMERICA TO
NEWSPAPER ASSOCIATION OF AMERICA WITNESS TYE (MOAA/NAA-T-1-2-3)

Pursuant to Sections 25 and 26 of the rules of practice, the Mail Order Association of America (MOAA), submits the following interrogatories VP/CN witness Tye (NAA-T1-2-3).

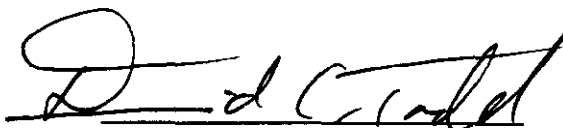
Respectfully submitted,



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Counsel for Mail Order Association of America

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the forgoing document upon the Postal Service by hand and by First-Class Mail upon all participants in this proceeding requesting such service.



David C. Todd

Date: June 19, 2000

**INTERROGATORIES OF MAIL ORDER ASSOCIATION OF
AMERICA TO NEWSPAPER ASSOCIATION OF AMERICA WITNESS TYE**

MOAA/NAA-T1-2: In your testimony, you state that "...the results of the distribution key analysis are 'cherry picked,' " at 2 line 8. Please identify any data regarding ECR pound costs that have been ignored that, if included, would have supported raising the pound rate.

MOAA/NAA-T1-3: In your discussion of "thinness of tallies" in witness Daniel's study you refer to "certain suggestions thus far in this case", at 10 line 14. Please identify the source of each of the "certain suggestions" presented in this case.